

279-3453

11/21/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 21, 2012

John Wright  
FMC Corporation  
1735 Market Street  
Philadelphia, PA 19103

Subject: Amendment – Change in Primary Brand Name  
TalstarGuard™ Collars  
EPA Reg. No. 279-3453  
Your submission dated November 8, 2012

Dear Mr. Wright:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. On page 3 delete one of the duplicate statements "Not recommended as sole protection against termites. For active infestations, get a professional inspection".

If you have any questions regarding this action, please contact BeWanda Alexander at [Alexander.bewanda@epa.gov](mailto:Alexander.bewanda@epa.gov) or (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander".

Richard Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7505P)

Enclosure

# TalstarGuard™ Collars

For the protection of service penetrations in residential, institutional, public, commercial, industrial structures from concealed termite entry.

For use by individuals/firms licensed or registered by the state or territory to apply termiticide products. States or territories may have more restrictive requirements regarding qualifications of persons using this product. Consult the pest control regulatory agency of your state or territory prior to use of this product.

**Active Ingredient:**

Bifenthrin* .....	0.1%
<b>Other Ingredients:</b> .....	<u>99.9%</u>
	100.0%

\*Cis isomers 97% minimum, trans isomers 3% maximum.  
U.S. Patent No. 4,238,505

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See additional precautionary statements, storage and disposal and directions for use inside booklet.

EPA Reg. No. 279-3453

EPA Est.

[FMC Logo]

FMC Corporation  
Agricultural Products Group  
Philadelphia, PA 19103

Net Contents: 40 x 4 in. (101.6 mm) Collars  
30 x 3 in. (76.2 mm) Collars  
30 x 2 in. (50.8 mm) Collars  
50 x 1.5 in. (38.1mm) Collars

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
NOV 21 2012**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
279-3453

<b>FIRST AID (Pyrethroid)</b>	
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER (Pyrethroid)</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-331-3148 for Emergency Assistance	
Note to Physician: This product is a pyrethroid. If large amounts have been ingested, milk, cream or other digestible fats and oils may increase absorption and so should be avoided.	
<b>For Information Regarding the Use of this Product Call 1-800-321-1FMC (1362).</b>	

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans (and Domestic Animals)**

**Caution**

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear gloves when handling this product.

**Environmental Hazards**

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate any water by disposal of this product.

**Directions for Use**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Precautions and Restrictions:**

Do not use for remedial treatment of pre-existing termite damage.

Do not use a collar with inside diameter size that does not exactly match the penetration outside diameter.

Do not use in situations where service penetrations do not enter a structure via a concreted section.

TalstarGuard Collars must be installed prior to the concrete pour.

Do not glue collars to service penetrations.

Not recommended as sole protection against termites. For active infestations, get a professional inspection.

For specific details on installation of collars, see instructions below.

**Product information**

TalstarGuard Collars provide protection from concealed entry via service penetrations of subterranean termites. Collars may be used in combination with other products intended for pre-construction applications, including FMC's termite management products. TalstarGuard Collars cannot be used as a remedial treatment for existing termite damage.

TalstarGuard Collars contain an active ingredient that is dispersed fully throughout the plastic collar. This means that there is no top or bottom of the collar – it may be installed equally effectively no matter which end is up. Collar size must match service penetration ensuring a snug fit occurs.

TalstarGuard Collars are to be used for protection of service penetrations in combination with a concrete slab acting as physical termite barrier, and/or in combination with other products intended for pre-construction applications. When used in combination with a concrete slab acting as a physical barrier, the slab must be poured in accordance with local slabs and footings requirements.

Not recommended as sole protection against termites. For active infestations, get a professional inspection.

One collar per penetration

**Critical application details**

**Pre-Installation**

Prior to installing TalstarGuard Collars, it is suggested that a site inspection is performed and the following precautions are carried out. Elimination of any active colony of economically important wood feeding species of subterranean termite found within the property boundary up to a distance of 164 ft. (50m) from the proposed new building work. All tree stumps, logs, and roots, shall be excavated and removed from the building footprint. All timber off-cuts, building debris, removable framework and other waste materials shall be removed from the area where the TalstarGuard Collars are to be installed. All structural material below the ground is to be made from termite resistant material such as masonry, concrete, steel, etc.

**Installation**

To install TalstarGuard Collars, position the similarly sized collar over the penetration pipe and push down until it makes contact with the pre-laid moisture membrane. No sticking or gluing is required as the fit is snug over the pipe. Installations are always made prior to pouring of the concrete slab. Reinforcing mesh is to be cut clear of the penetration pipe to allow the collar to be positioned so it is contained entirely with the slab.

Termites have been shown to be able to gain access via extremely small openings (greater than 0.04 in. (1mm). For this reason TalstarGuard Collars are designed to provide a snug fit over

service penetration pipes and are fully encased in concrete after the concrete is poured. If a snug fit cannot be guaranteed and gaps are present TalstarGuard Collars are not to be used. In such a case, use other products intended for pre-construction applications applied as per the product label for protection of the service penetrations.

**Multiple penetrations in the perimeter**

Clusters of penetrations in close proximity are termed multiple penetrations or cluster penetrations. In cases where multiple penetrations do not allow TalstarGuard Collars to be fitted as per the above installation instructions, use other products intended for pre-construction applications for protection of these service penetrations.

**Service Requirements:**

TalstarGuard Collars contain an insecticide, which will both kill and repel termites that come into contact with it. The objective of TalstarGuard Collars is to prevent concealed access from subterranean termites entering via service penetrations. Termites can still enter a structure via other routes.

Regular competent inspection is suggested as part of an ongoing termite management program. Service requirements are to be determined as a result of at least an annual inspection by a licensed Pest Management Professional (PMP). More frequent inspections may be required in high-risk termite areas. In determining the need for service, factors such as local termite pressure, breaches of the barrier and termiticide longevity are to be considered.

**STORAGE AND DISPOSAL**

Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal. **Pesticide Storage:** Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, close tightly. In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call FMC (800) 331-3148. To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents. **Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal law. Dispose of excess or waste pesticide by use according to label directions, or contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **Container Handling:** [Plastic Bags] Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Completely empty bag. Then offer for recycling, if available or dispose of empty bags in a sanitary landfill, or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions beyond the control of FMC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold FMC and Seller harmless for any claims relating to such factors.

**Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the directions under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, FMC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT. Any warranties, express or implied, having been made are inapplicable if this product has been contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to (or beyond the control of) seller or FMC, and buyer assumes the risk of any such use.**

To the extent consistent with applicable law, FMC or seller shall not liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF FMC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF FMC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

**FMC & TalstarGuard - Trademarks of FMC Corporation**

**Formulated and packaged in Australia**

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Container Label

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**Formulated and packaged in Australia**

TalstarGuard™ Collars

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